UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

October 2, 2003

Mr. Chuck McLaughlin
OPOG Project Coordinator
de Maximis, Inc.
5225 Canyon Crest Dr. Blg 200, Suite 253
Riverside, CA 92507

RE: Omega Chemical Superfund Site; Whittier, CA

Dear Mr. McLaughlin:

Please consider this letter formal EPA approval of the following documents:

- Omega Chemical Superfund Site Sampling and Analysis Plan Addendum for Additional Data Collection in the Phase 1a Area, dated September 6, 2002 and as amended November 4, 2002.
- Omega Chemical Superfund Site Final On-Site Soils Remedial Investigation/Feasibility Study Work Plan, dated September 29, 2003.

If you have any questions please contact me at (415) 972-3149.

Sincerely,

Chris Lichens
Superfund Project Manager

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

November 18, 2002

**MEMORANDUM**

SUBJECT: Sampling and Analysis Plan Addendum for Additional Data Collection in the Phase 1a Area, Omega Chemical Superfund Site, Whittier, California (EPA QA Office Document Control Number [DCN] BCCA007S02VSF2)

FROM: David R. Taylor, Ph.D., Chemist
Quality Assurance Office (PMD-3)

THROUGH: Vance S. Fong, P.E., Chief
Quality Assurance Office (PMD-3)

TO: Nancy Riveland-Har, Remedial Project Manager
Hawaii/Nevada/California Clean Up Section, SFD-7-4

An additional table, received November 4, 2002, for inclusion to the subject Sampling and Analysis Plan (SAP) Addendum, prepared for the Omega Chemical Site PRP Organized Group (OPOG) by Camp Dresser & McKee, Inc. (CDM) and dated September 6, 2002, was reviewed. The table was received in response to QA Office comments dated October 6, 2002. The addendum itself is based on the previously approved SAP, "Downgradient Well Installation and Groundwater Monitoring Sampling and Analysis Plan for the Omega Chemical Superfund Site" approved March 22, 2001. (Final plan was dated April 20, 2001).

It is assumed that the conditions established in the April 20th SAP remain in place. The newly supplied table address the concern previously raised. The Addendum is approved by the QA Office. The original concern is provided below in normal type. An evaluation of the table follows in normal type.

**Concern**

1. [Section 2-2, Semi-Annual Monitoring Well Sampling and Analysis] **This addendum adds several parameters which were not covered in the original approved Downgradient SAP. A number of these are field parameters which will be measured using test kits or other field screening procedures or hydraulic tests for which the Standard Operating Procedure is attached. The manufacturer's descriptions of these methods, which have included as an appendix covers them sufficiently. However, a number of fixed laboratory analytes are also added; nitrate/nitrite, methane/ethane/ethene, dissolved organic carbon, hexavalent**

**chromium, and 1,4-dioxane. Table 3-2 provides quantitation limits, and accuracy and precision limits for these analytes (with the exception of the methane/ethane/ethene and 1-4-dioxane analyses). Table 3-2 is comparable to Table 4-4 in the original SAP. However, no table comparable to Table 4-3, Summary of Minimum Laboratory Quality Control Requirements, Organic and Inorganic Analyses, was provided. Such a table is needed for these additional analytes. Since the 1-4-dioxane will be analyzed by Method 8270, which was included in the original SAP, only the acceptance criteria (Table 4-4 equivalent information) need be provided, unless the method modifications render the information in Table 4-4 not applicable to this separate analysis. Information for the methane/ethane/ethene analyses need only be supplied, via a separate letter if desired, in the event these become target analytes which presently appears unlikely.**

This comment has been satisfactorily addressed. An expanded Table 3-3 containing the requested information for EPA Methods 300.0 (Nitrate/Nitrite), 9060 (Dissolved Organic Carbon), 7199 (hexavalent chromium), 8270 (1,4,-Dioxane), and 314 (perchlorate), has been provided with quality control information for all the analyses.

If you have any questions concerning this memorandum, please email me at Taylor.David@epa.gov or feel free to call me at (415) 972-3803.